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Attorneys for Defendant SUNGAGE FINANCIAL LLC

CAMERON BEATTY, individually
and on behalf of all others similarly
situated,

Plaintiff,

v.

SUNGAGE FINANCIAL, LLC, a
Massachusetts limited liability
company; NBT BANK, N.A., a New
York Corporation; SUNMADE
ENERGY, LLC, a California limited
liability company; and DOES 1
through 50, inclusive,

Defendants.

Case No. 1:25-cv-00645-KES-SKO

**Joint Stipulation AND ORDER for
defendants to RESPOND TO
AMENDED COMPLAINT**

(Doc. 28)

Filing Date: August 15, 2025
Trial Date: None set

1 Plaintiff Cameron Beatty and Defendants Sungage Financial, LLC (“Sungage”);
2 and NBT Bank, N.A. (“NBT”) (collectively “Defendants”), by and through their
3 counsel, hereby make the following stipulations regarding the deadline for Defendants
4 to respond to Plaintiff’s Amended Complaint.

5 1. WHEREAS, on August 18, 2025, the Parties filed a Joint Stipulation
6 and Proposed Order that included language stating that Plaintiff shall have until
7 September 30, 2025 to file an amended complaint (Dkt. No. 24);

8 2. WHEREAS the Joint Stipulation and Proposed Order filed on August 18,
9 2025 also included language that Defendants deadline to respond to the amended
10 complaint would be October 30, 2025 (Dkt. No. 24);

11 3. WHEREAS on August 18, 2025, the Court entered an Order granting that
12 stipulation (Dkt. No.25);

13 4. WHEREAS Plaintiff did not file his amended complaint until October 22,
14 2025 (Dkt. No. 27);

15 5. WHEREAS the Parties have agreed that Defendants’ new deadline to respond
16 to the amended complaint should be November 21, 2025;

17 6. THEREFORE, subject to the Court’s approval, the Parties HEREBY
18 STIPULATE that Defendants’ deadline to respond to the amended complaint is
19 November 21, 2025.
20

21 Dated: October 30, 2025

LAW OFFICES OF JASON M. INGBER

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24 By: /s/Jason M. Ingber (with email authorization)
25 Jason M. Ingber
26 Serach B. Shafa
27 Attorneys for Plaintiff
28 Cameron Beatty

1 Dated: October 30, 2025

WIECHERT, MUNK & GOLDSTEIN, PC

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3 By: /s/Jessica Munk
4 Jessica C. Munk
5 David W. Wiechert
6 Attorneys for Defendant
7 Sungage Financial, LLC

8
9 Dated: October 30, 2025

MURPHY & KING

10 By: /s/ Dan Rabinovitz (with email authorization)
11 Daniel J. Goodrich, PHV
12 Daniel M. Rabinovitz, PHV
13 Attorneys for Defendant
14 Sungage Financial, LLC

15 Dated: October 30, 2025

ALSTON & BIRD LLP

16 By: /s/David Carpenter (with email authorization)
17 Tracy Yao
18 David B. Carpenter, PHV
19 Kelley Connolly Barnaby, PHV
20 Attorneys for Defendant
21 NBT BANK, N.A.
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ORDER

Based on the Parties' foregoing Stipulation (Doc. 28), and good cause appearing, the Court hereby ORDERS that Defendants' deadline to respond to the amended complaint is **November 21, 2025**.

IT IS SO ORDERED.

Dated: **October 31, 2025**

/s/ Sheila K. Oberto
UNITED STATES MAGISTRATE JUDGE